

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

XUEDAN WANG and ERIN SPENCER, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

THE HEARST CORPORATION,

Defendant.

12 Civ. 0793 (HB) (AJP)

**SUPPLEMENTAL DECLARATION OF RACHEL BIEN IN SUPPORT OF
PLAINTIFFS' MOTIONS FOR PARTIAL SUMMARY JUDGMENT AND
CLASS CERTIFICATION PURSUANT TO FED. R. CIV. P. 23
(PART I OF IV)**

I, Rachel Bien, declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at Outten & Golden LLP ("O&G"), counsel for Plaintiffs and opt-in Plaintiffs ("Plaintiffs") in the above-captioned action.
2. I am an attorney in good standing admitted to practice in the State of New York and before this Court.
3. I have been one of the attorneys primarily responsible for the prosecution of this action.
4. I make this declaration in support of Plaintiffs' Motions for Partial Summary Judgment and Class Certification Pursuant to Fed. R. Civ. P. 23. I have personal knowledge of the matters set forth herein and would so testify if called as a witness at trial.
5. Attached hereto are exhibits 1 through 70 to the Declaration of Rachel Bien In Support of Plaintiffs' Motions for Partial Summary Judgment and Class Certification Pursuant to Fed. R. Civ. P. 23, ECF No. 109.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 6, 2013

Respectfully submitted,

/s/ Rachel Bien

Rachel Bien

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